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Provide the docket's number.	25-117
Leave a comment on the docket. *	In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project, Docket Number: E002, ET2, ET6675/CN-25-117, included are my comments regarding the application completeness.
Attach a File	 <a href="#">comments_on_application_25117_completeness.pdf</a> 388.73 KB · PDF

## Comments on Application 25-117 Completeness

In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project, Docket Number: E002, ET2, ET6675/CN-25-117, included below are my comments regarding the application completeness.

One of the Topics for Comment is: *“Does the certificate of need application contain the information required under Minn. R. 7849.0220, subp. 2?”* This rule states, in part: *“Each application for a certificate of need for an LHVTL shall include all of the information required by parts 7849.0240 and 7849.0260 to 7849.0340.”*

Minn. R. 7849.0260 states, in part: *“Each application for a proposed LHVTL must include: ... E. such other information about the proposed facility and each alternative as may be relevant to determination of need.”* I submit the proposed alternative below is relevant to the determination of need for parts of the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project.

In the PowerOn Midwest Certificate of Need Application (Docket #25-117, 20262-227787-02, Pages 185-201), Chapter 7 looks at Alternatives to the Project. Chapter 7, on page162, states: *“Minn. R. 7849.0340 further requires an applicant to analyze not building the proposed facility (or, the no-build alternative).”*

There is an important proposed alternative for the Gopher to Badger Link; the No Build Segment 1 and Partial Build Segment 2 Option. That proposed alternative was resubmitted as a Public Comment on the Completeness of Application 25-121, on February 17, 2026 (Docket #25-121, 20262-228222-02). That proposed alternative would eliminate the need for the 34-mile 765 kV circuit from the North Rochester Substation to the Marion junction (No Build Segment 1) and would eliminate the 31-mile 765 kV circuit from the Marion junction to near the Adams Substation (Partial Build Segment 2). These segments would be replaced by a 17-mile 765 kV connector link from the Pleasant Valley Substation to near the Adams Substation, eliminating approximately 48 miles of transmission line. (See Exhibit D)

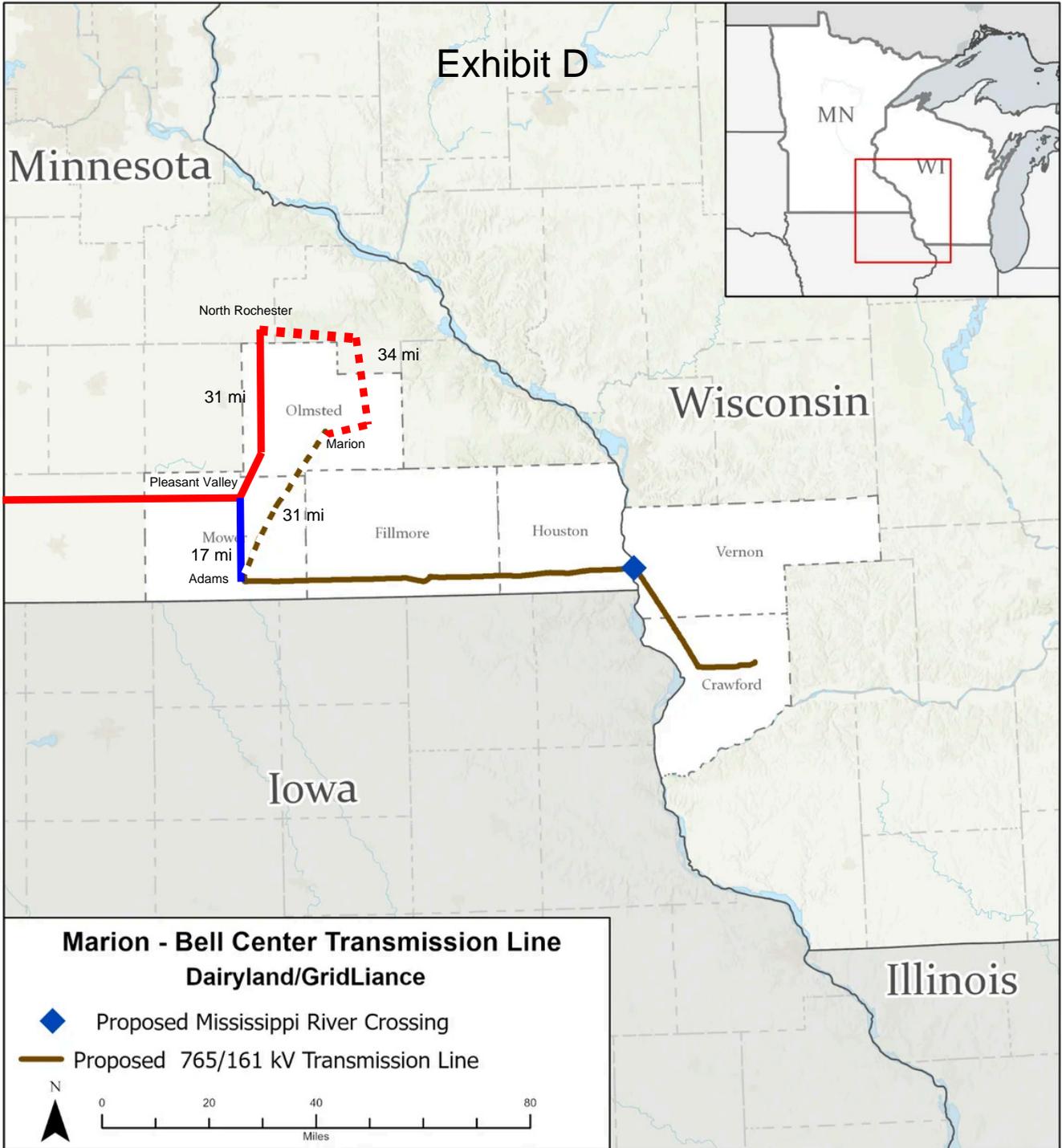
The No Build Segment 1 and Partial Build Segment 2 Option proposed alternative does not directly affect the PowerOn Midwest 31-mile 765 kV circuit from the Pleasant Valley Substation to a new North Rochester Substation, which would now stub off of the 765 kV backbone circuit. In light of the proposed modification for the Gopher to Badger Link removing the North Rochester substation from the 765 kV backbone circuit across southern Minnesota, the need for a 765 kV circuit from the Pleasant Valley Substation to a new North Rochester Substation is ripe to be reconsidered for a No-Build Alternative (No Build Pleasant Valley to North Rochester 765kV Option), or delayed to a future MISO Tranche where the need can be justified. The proposed No Build Pleasant Valley to North Rochester 765kV Option would only affect the PowerOn Midwest 31-mile 765 kV circuit from the Pleasant Valley Substation to a new North Rochester Substation. No other changes to the PowerOn Midwest Application are being proposed here.

Assuming for the moment that the Gopher to Badger Link No Build Segment 1 and Partial Build Segment 2 Option is adopted, the only remaining connection to the new approximately 105-acre North Rochester Substation will be a 345 kV line extending to the existing North Rochester Substation (see the PowerOn Midwest Certificate of Need Application, Section 2.3.3, Pages 50-51). A new 765 kV circuit from the Pleasant Valley Substation to a new North Rochester Substation (No Build Pleasant Valley to North Rochester 765kV Option) may not be needed at this time to be only connected to only a single 345 kV transmission line. Excluding the one 345 kV connection to the 765 kV new substation, there are 10-345 kV connections and 2-161 kV connections planned or currently existing to the North Rochester Substation.

The No Build Pleasant Valley to North Rochester 765kV Option would eliminate approximately 31 miles of 765kV transmission line. At an estimated cost of \$6.3 million per mile, this would result in a savings of estimated \$195 Million. Along with the savings of estimated \$302 Million for the No Build Segment 1 and Partial Build Segment 2 Option, and the estimated \$500 Million savings from not building a new North Rochester Substation, the total savings from these two options could approach \$1,000 Million (\$1 Billion).

The No Build Segment 1 and Partial Build Segment 2 Option and the No Build Pleasant Valley to North Rochester 765kV Option may be more reasonable and prudent alternatives to the proposed Projects, which could be demonstrated by a preponderance of evidence when analyzed by the applicants. These options may help make many residents and farmers very happy that would not be impacted by a new 765 kV line going through or near their property.

Respectfully submitted,  
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Original map source: <https://www.maribelltransmission.com/project-details> 11-30-2025